

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: JAKKI DEE, { CHAPTER 13
{
{ DEBTOR(S) { CASE NO. A18-66618-SMS
{
{ JUDGE SIGLER

OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. Pursuant to the proposed plan, the Debtor has a domestic support obligation. Prior to confirmation the Debtor must provide to the Trustee evidence that all payments that have come due since the filing of the petition have been maintained. 11 U.S.C. Section 1325(a)(8).
3. The Debtor has failed to return either completed Cash Flow Reports or Questionnaire to Business Debtor(s). The Trustee is unable to determine the feasibility of the proposed plan. 11 U.S.C. Section 1325(a)(6).
4. The Chapter 13 Trustee was unable to conduct the meeting of creditors scheduled for December 11, 2018 as the Debtor had not provided requested documentation regarding his business.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

December 13, 2018

/s/
K. Edward Safir, Attorney
for Chapter 13 Trustee
GA Bar No. 622149

Mary Ida Townson, Chapter 13 Trustee
Suite 2200 - 191 Peachtree Street, N.E.
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A18-66618-SMS

CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S) :

JAKKI DEE
4169 GLADNEY DRIVE
ATLANTA, GA 30340

ATTORNEY FOR DEBTOR(S) :

CLARK & WASHINGTON, PC
BLDG. 3
3300 NORTHEAST EXPRESSWAY
ATLANTA, GA 30341

in the foregoing matter with a copy of this pleading by
depositing in the United States Mail a copy of same in a
properly addressed envelope with adequate postage thereon.

This 13th day of December 2018

/s/
K. Edward Safir, Attorney
for Chapter 13 Trustee
GA Bar No. 622149

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